

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)
) **Re: Docket Nos. 13 and 277**

**CERTIFICATION OF COUNSEL FINAL ORDER (A) (I) APPROVING THE
DEBTORS' PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE
UTILITY SERVICES, (II) PROHIBITING UTILITY PROVIDERS FROM ALTERING,
REFUSING, OR DISCONTINUING SERVICES, (III) APPROVING
THE DEBTORS' PROPOSED PROCEDURES FOR RESOLVING
ADEQUATE ASSURANCE REQUESTS, AND (B) GRANTING RELATED RELIEF**

The undersigned hereby certifies that:

1. On August 7, 2023, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Motion of Debtors for Entry of Interim and Final Orders (A)(I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (B) Granting Related Relief* (the "Motion") [Docket No. 13].

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

2. On August 17, 2023, the Court entered the *Interim Order (A)(I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (B) Granting Related Relief* (the “Interim Order”) [Docket No. 277].

3. The deadline to respond with respect to final relief sought in the Motion was August 31, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

4. The Debtors circulated a proposal form of final order to the Office of the United States Trustee, counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, and the United States Department of the Treasury (the “Reviewing Parties”).

5. On August 25, 2023, certain utility companies filed an objection (the “Objecting Utilities”) [Docket No. 337]. The Debtors have resolved the objection by the Objecting Utilities, which have withdrawn the objection [Docket No. 495].

6. Attached hereto as Exhibit A is a revised proposed form of final order (the “Revised Proposed Final Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the order. Attached hereto as Exhibit B is a redline of the Revised Proposed Final Order showing changes against the final order filed with the Motion.

7. Accordingly, the Debtors respectfully request entry of the Revised Proposed Final Order attached hereto as Exhibit A at the Court's earliest convenience.

Dated: September 12, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

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